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December 17, 2007

Via Hand Delivery

The Honorable Joseph J. Farnan, Jr.
United States District Court
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801

Re: Delsie E. Brookens v. General Motors Corporation, et al.
United States District Court, District of Delaware
Case No. 07-387 (JJF)

Dear Judge Farnan:

On November 30, 2007, you sent a letter to both Plaintiff and Defense counsels ordering that we comply with Fed. R. Civ. Proc 16(b) and Local Rule 16.2 and submit a Proposed Pretrial Scheduling Order on or before today, Monday, December 17, 2007. Since receiving your letter, I have attempted to contact Plaintiff's counsel without success. As such, we propose the following schedule to govern Pre-Trial deadlines.

In this case, Plaintiff has alleged violations of ERISA, 29 U.S.C. §1101 et seq. Because there is no discovery in ERISA cases, Defendants submit the following as their Proposed Pretrial Scheduling Order:

1. Submission of Administrative Record: Defendants propose filing the administrative record on or before January 31, 2008.
2. Joinder of other parties: All motions to join other parties shall be filed on or before January 15, 2008.
3. Identification of Procedural Defect: To date Plaintiff has not identified any underlying procedural defect. If such a defect will be identified, it should be identified by January 15, 2008.
4. Amendment of the Pleadings: All motions to amend the pleadings shall be filed on or before January 15, 2008.

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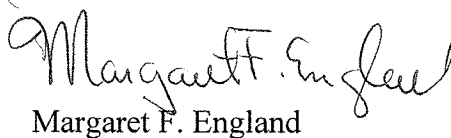
5. Case Dispositive Motions: Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before March 31, 2008. Briefing shall be pursuant to D. Del. LR 7.1.2. No case dispositive motion may be filed more than ten (10) days after the above date without leave of the Court.

6. Applications by Motion: Any applications for non-dispositive motions shall be in writing and comply with the Federal Rules of Civil Procedure and the Local Rules of Civil Practice for the United States District Court for the District of Delaware. Briefs shall be limited to no more than ten (10) pages.

7. Pretrial Conference and Trial: After reviewing the parties' Proposed Scheduling Order, the Court will schedule a Pretrial Conference. The Court will determine whether the trial date should be scheduled when the Scheduling Order is entered or at the Pretrial Conference. If scheduling of the trial date is deferred until the Pretrial Conference, the parties and counsel shall anticipate and prepare for a trial to be held within sixty (60) to ninety (90) days of the Pretrial Conference.

If you have any questions, or wish to discuss this matter further, feel free to contact me.

Respectfully,



Margaret F. England

cc: David M. Davis, Esq. (via facsimile)
John Stull, Esq. (via First Class Mail)